

**UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
Alexandria Division**

TAREQ AQEL MOHAMMED AZIZ,	)	
<i>et al.</i> ,	)	
	)	
Petitioners,	)	
	)	
vs.	)	Civil Action No. 1:17cv116
	)	
DONALD TRUMP,	)	
President of the United States, <i>et al.</i> ,	)	
	)	
Respondents.	)	
_____	)	

**JOINT REQUEST TO HOLD CLAIMS IN ABEYANCE**

The undersigned parties hereby jointly request that the Court hold Petitioners' claims in this case in abeyance. The parties, by and through undersigned counsel, have a signed agreement to resolve Petitioners claims against Defendants. The parties require time to execute the particulars of the agreement, which may take several days to fully implement. The parties will promptly and without delay inform the Court when the agreement is fully executed.

Accordingly, in order to permit the undersigned parties to focus their efforts on resolving this case without further litigation, the undersigned parties respectfully request that this Court place Petitioners' claims in this case in abeyance.

Respectfully submitted,

\_\_\_\_\_/s/  
Simon Y. Sandoval-Moshenberg (VA 77110)  
Mary Bauer (VA 31388)  
Rebecca Wolozin (VA 89690)  
Elaine Poon (pro hac vice)  
LEGAL AID JUSTICE CENTER  
6066 Leesburg Pike #520  
Falls Church, VA 22041

DANA J. BOENTE  
United States Attorney

JOYCE BRANDA  
Acting Assistant Attorney General  
Civil Division

(703) 720-5605  
simon@justice4all.org  
mary@justice4all.org  
becky@justice4all.org  
elaine@justice4all.org

Andrew J. Pincus (pro hac vice)  
Paul W. Hughes (pro hac vice)  
MAYER BROWN LLP  
1999 K Street, N.W.  
Washington, D.C. 20006  
(202) 263-2000

apincus@mayerbrown.com  
phughes@mayerbrown.com

DATE: February 1, 2017

WILLIAM PEACHEY  
Director  
Civil Division, Office of Immigration  
Litigation

By:                     /s/                      
DENNIS C. BARGHAAN, JR.  
Assistant U.S. Attorney  
2100 Jamieson Avenue  
Alexandria, Virginia 22314  
Telephone: (703) 299-3891  
Fax: (703) 299-3983  
Email: [dennis.barghaan@usdoj.gov](mailto:dennis.barghaan@usdoj.gov)

EREZ REUVENI  
Senior Litigation Counsel  
Civil Division, Office of Immigration  
Litigation  
P.O. Box 868  
Ben Franklin Station  
Washington, D.C. 20044  
Telephone: (202) 307-4293  
Fax: (202) 616-8962  
Email: [erez.r.reuveni@usdoj.gov](mailto:erez.r.reuveni@usdoj.gov)

ATTORNEYS FOR RESPONDENTS

**CERTIFICATE OF SERVICE**

I hereby certify that on this date, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which will transmit a true and correct copy of the same to the following:

Simon Sandoval Moshenbourg  
Legal Aid Justice Center  
6066 Leesburg Pike, Suite 520  
Falls Church, Virginia 22041  
Email: [Simon@justice4all.org](mailto:Simon@justice4all.org)

Date: February 1, 2017

/s/  
DENNIS C. BARGHAAN, JR.  
Assistant U.S. Attorney  
2100 Jamieson Avenue  
Alexandria, Virginia 22314  
Telephone: (703) 299-3891  
Fax: (703) 299-3983  
Email: [dennis.barghaan@usdoj.gov](mailto:dennis.barghaan@usdoj.gov)

ATTORNEYS FOR RESPONDENTS